

## **EXHIBIT B**

**[2018 Administrative Costs Budget]**

**MLC GUC Trust**  
**2018 (Calendar Year) Administrative Costs Budget**  
November 2017

<i>\$ in thousands</i>	QE 3.31	QE 6.30	QE 9.30	QE 12.31	Total Budget CY 2018	2017 Annual Budget	2017 Actual/Est.
Governance Costs							
Trust Monitor (FTI Consulting)	204.00	204.00	204.00	204.00	816.00	818.00	812.82
Trust Administrator (Wilmington Trust)	357.70	357.70	357.70	357.70	1,430.80	1,430.80	1,405.77
<b>Subtotal for Governance Costs</b>	<b>561.70</b>	<b>561.70</b>	<b>561.70</b>	<b>561.70</b>	<b>2,246.80</b>	<b>2,248.80</b>	<b>2,218.59</b>
Financial Reporting & Claims Resolution							
Alix Partners	96.00	96.00	96.00	96.00	384.00	384.00	218.24
Distribution Advisor-Epiq	5.00	5.00	5.00	5.00	20.00	50.00	13.95
Claims Agent (Garden City Group)	18.38	18.38	18.38	18.38	73.50	132.00	90.89
Trust Corporate Counsel (Gibson Dunn) (Wind Down)	150.00	150.00	150.00	150.00	600.00	600.00	924.52
Trust Recall Matter Counsel (Gibson Dunn) (a)	1,500.00	500.00	500.00	500.00	3,000.00	2,000.00	2,510.30
<b>Subtotal for Financial Reporting &amp; Claims Resolution</b>	<b>1,769.38</b>	<b>769.38</b>	<b>769.38</b>	<b>769.38</b>	<b>4,077.50</b>	<b>3,166.00</b>	<b>3,757.91</b>
Investment, Accounting & Tax Advisors							
Investment Management Services (Wilmington Trust)	65.00	65.00	65.00	65.00	260.00	340.00	278.82
External Auditor (Plante Moran)	22.00	110.00	5.00	5.00	142.00	142.00	125.87
Tax Advisor (Rick Zablocki)	10.00	15.00	10.00	10.00	45.00	65.00	42.30
<b>Subtotal for Investment, Accounting &amp; Tax Advisors</b>	<b>97.00</b>	<b>190.00</b>	<b>80.00</b>	<b>80.00</b>	<b>447.00</b>	<b>547.00</b>	<b>447.00</b>
Other Expenses							
Insurance Expense	57.00	57.00	57.00	57.00	228.00	248.80	293.11
US Trustee Fees	13.00	13.00	13.00	13.00	52.00	52.00	49.40
Contingency	500.00	500.00	500.00	500.00	2,000.00	2,000.00	0.00
<b>Subtotal for Other Expenses</b>	<b>570.00</b>	<b>570.00</b>	<b>570.00</b>	<b>570.00</b>	<b>2,280.00</b>	<b>2,300.80</b>	<b>342.51</b>
<b>Total Wind Down Expense</b>	<b>2,998.08</b>	<b>2,091.08</b>	<b>1,981.08</b>	<b>1,981.08</b>	<b>9,051.30</b>	<b>8,262.60</b>	<b>6,766.00</b>

Projected Cash available to carry over:

0.00

Estimated request to re-allocate:

9,051.30

(a) Budget line item for "Trust Recall Matter Counsel (Gibson Dunn)" assumes (i) that the Signatory Plaintiffs' Motion to Enforce Settlement Agreement [Dkt. No. 14092] (the "Plaintiffs' Motion") is not approved by the Bankruptcy Court, and (ii) that the GUC Trust's Motion to Authorize Forbearance Agreement [Dkt. No. 14095] (the "GUC Trust's Motion") is similarly not approved by the Bankruptcy Court. In such scenario, the GUC Trust intends to continue to vigorously defend its interests against the Plaintiffs' prior motions seeking authority to file late claims against the GUC Trust. In the event that either the Plaintiffs' Motion or the GUC Trust's Motion are granted by the Bankruptcy Court and upheld on appeal (if any), or any other unanticipated material legal matter arises, then the dollar values set forth in the line item "Trust Recall Matter Counsel (Gibson Dunn)" will likely be materially different than as set forth in the Budget.